

KELLER BENVENUTTI KIM LLP
Tobias S. Keller (#151445)
(tkeller@kbkllp.com)
Peter J. Benvenutti (#60566)
(pbenvenutti@kbkllp.com)
Jane Kim (#298192)
(jkim@kbkllp.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: 415 496 6723
Fax: 650 636 9251

Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

- Affects PG&E Corporation
- Affects Pacific Gas and Electric Company
- Affects both Debtors

** All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**NOTICE OF HEARING ON
REORGANIZED DEBTORS' SEVENTH
OMNIBUS OBJECTION TO CLAIMS
(SATISFIED CLAIMS)**

**Response Deadline:
September 29, 2020, 4:00 p.m. (PT)**

Hearing Information If Timely Response Made:

Date: October 13, 2020
Time: 10:00 a.m. (Pacific Time)
Place: (Telephonic Appearances Only)
United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 **PLEASE TAKE NOTICE** that on January 29, 2019 (the “**Petition Date**”), PG&E Corporation
2 and Pacific Gas and Electric Company, as debtors and reorganized debtors (the “**Debtors**,” or as
3 reorganized pursuant to the Plan, the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases
4 (the “**Chapter 11 Cases**”), each filed a voluntary petition for relief under chapter 11 of title 11 of the
United States Code (the “**Bankruptcy Code**”) with the United States Bankruptcy Court for the
Northern District of California (San Francisco Division) (the “**Bankruptcy Court**”).

5 **PLEASE TAKE FURTHER NOTICE** that the Bankruptcy Court will hold a hearing on
6 **October 13, 2020, at 10:00 a.m. (Pacific Time)** (the “**Omnibus Hearing**”) before the Honorable
Dennis Montali, United States Bankruptcy Judge. Pursuant to the Bankruptcy Court’s *Amended
General Order No. 38 In re: Coronavirus Disease Public Health Emergency*, dated March 30, 2020,
7 **the Omnibus Hearing will be conducted telephonically. The courtroom will be closed.** All parties
8 who wish to appear at the Omnibus Hearing must make arrangements to appear telephonically with
9 CourtCall at 1-866-582-6878 no later than 4:00 p.m. (Pacific Time) on the day before the Omnibus
Hearing. Further information regarding telephonic appearances via CourtCall can be found on the
10 Bankruptcy Court’s website, at the following location: www.canb.uscourts.gov > Rules and
Procedures > District Procedures > Policy and Procedure for Appearances by Telephone. Charges
11 have been waived by CourtCall for pro se parties.

12 **PLEASE TAKE FURTHER NOTICE** that, in addition to any other matters to be heard at the
13 Omnibus Hearing, the Bankruptcy Court is scheduled to hear the *Reorganized Debtors’ Seventh
Omnibus Objection to Claims (Satisfied Claims)*, filed on September 3, 2020 [Dkt. No. 8981] (the
14 “**Omnibus Objection**”).

15 **PLEASE TAKE FURTHER NOTICE** that any oppositions or responses to the Omnibus
Objection must be in writing, filed with the Bankruptcy Court, and served on counsel for the
16 Reorganized Debtors at the above-referenced address or by email at PGEclaims@kbkllp.com so as to
be received by no later than **4:00 p.m. (Pacific Time) on September 29, 2020**. Any oppositions or
17 responses must be filed and served as described in the *Order Approving (A) Procedures for Filing
Omnibus Objections to Claims and (B) the Form and Manner of the Notice of Omnibus Objections*,
18 entered on July 1, 2020 [Dkt No. 8228] (the “**Omnibus Objections Procedures Order**”). **Any relief
requested in the Omnibus Objection may be granted without a hearing if no opposition is timely
filed and served in accordance with the Omnibus Objections Procedures Order.** In deciding the
19 Omnibus Objection, the Court may consider any other document filed in these Chapter 11 Cases and
20 related Adversary Proceedings.

21 **PLEASE TAKE FURTHER NOTICE** that a customized Seventh Omnibus Claim Objection
22 Notice in substantially the form attached hereto as **Exhibit A** has been sent to each of the parties to
23 whose Proof(s) of Claim the Reorganized Debtors objected in the Omnibus Objection.

24 **PLEASE TAKE FURTHER NOTICE** that copies of the Omnibus Objection and its
supporting papers can be viewed and/or obtained: (i) by accessing the Court’s website at
25 <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden
Gate Avenue, San Francisco, CA 94102, or (iii) from the Reorganized Debtors’ notice and claims
26 agent, Prime Clerk LLC , at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll
27 free) for U.S.-based parties; or +1 (929) 333-8977 for International parties or by e-mail at:
28 pgeinfo@primeclerk.com. Note that a PACER password is needed to access documents on the
Bankruptcy Court’s website.

1 Dated: September 3, 2020

2 **KELLER BENVENUTTI KIM LLP**

3 /s/ Peter J. Benvenutti

4 Peter J. Benvenutti

5 *Attorneys for Debtors and Reorganized Debtors*

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

Exhibit A

Seventh Omnibus Claim Objection Notice

1 KELLER BENVENUTTI KIM LLP
2 Tobias S. Keller (#151445)
(tkeller@kbkllp.com)
3 Peter J. Benvenutti (#60566)
(pbenvenutti@kbkllp.com)
4 Jane Kim (#298192)
(jkim@kbkllp.com)
5 650 California Street, Suite 1900
6 San Francisco, CA 94108
Tel: 415 496 6723
Fax: 650 636 9251

7 *Attorneys for Debtors and Reorganized Debtors*
8

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

THE OBJECTION DESCRIBED IN
THIS NOTICE ASKS THE COURT TO
DISALLOW AND EXPUNGE YOUR
CLAIM(S) IDENTIFIED AS
“OBJECTED-TO” ON THE
FOLLOWING PAGE OF THIS
NOTICE.

CLAIMANTS RECEIVING THIS
NOTICE SHOULD READ THIS
NOTICE CAREFULLY BECAUSE THE
OBJECTION MAY AFFECT YOUR
RIGHT TO RECEIVE A
DISTRIBUTION ON YOUR CLAIM IN
THIS CASE.

IF YOU HAVE QUESTIONS, PLEASE
CONTACT PRIME CLERK, LLC, AT
(844) 339-4217

THE LAST PARAGRAPH OF THIS
NOTICE EXPLAINS HOW YOU CAN
OBTAIN A COMPLETE COPY OF THE
OBJECTION, AT NO COST TO YOU.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

Affects PG&E Corporation
 Affects Pacific Gas and Electric Company
 Affects both Debtors

* All papers shall be filed in the Lead Case, No.
19-30088 (DM).

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

NOTICE OF THE REORGANIZED
DEBTORS' SEVENTH OMNIBUS
OBJECTION TO CLAIMS (SATISFIED
CLAIMS)

Response Deadline:
September 29, 2020, 4:00 p.m. (PT)

Hearing Information If Timely Response Made:

Date: October 13, 2020

Time: 10:00 a.m. (Pacific Time)

Place: Telephonic Appearances Only
United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 [Claimant Name]

2

Objected-To Claim(s)					Basis for Objection
Date	Claim #	Debtor	Classification	Amount	

3

4

5

6 On September 3, 2020, PG&E Corporation and Pacific Gas and Electric Company, as debtors
7 and reorganized debtors (collectively, the “**Debtors**,” or as reorganized pursuant to the Plan, the
8 “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), filed
9 their *Seventh Omnibus Objection to Claims (Satisfied Claims)* (the “**Omnibus Objection**”) with the
United States Bankruptcy Court for the Northern District of California (San Francisco Division) (the
“**Bankruptcy Court**”). A full copy of the Omnibus Objection may be obtained at no cost, as provided
below.

10 **Any Response (as defined below) to the Omnibus Objection must be filed and**
11 **served upon the Reorganized Debtors’ Counsel by September 29, 2020 (the**
12 **“Response Deadline”);**

13 **Any Response must be accompanied by any declarations or memoranda of law any**
14 **responding party wishes to present in support of its position;**

15 **If there is no timely Response, the Bankruptcy Court may enter an order granting**
16 **the Omnibus Objection to your Proof(s) of Claim by default.**

17 **If you file a timely Response, the Hearing will be held at the date and time shown**
18 **below. If factual disputes are presented by the Objection and the Response, the**
19 **Hearing will proceed as a status conference; factual disputes will not be decided at**
20 **the Hearing, but at a future evidentiary hearing that may be set at the Hearing.**
21 **Issues of a purely legal nature, where facts are not in dispute, may be decided at**
22 **the Hearing. See Bankruptcy Local Rule 3007-1.**

23 **If you file and serve a timely Response, the date, location and time of the Hearing**
24 **are:**

25 **October 13, 2020 at 10:00 a.m. (Pacific Time)**

26 **Courtroom 17, 16th Floor, 450 Golden Gate Ave., San Francisco, CA**

27 The Hearing will be held before the Honorable Dennis Montali, United States Bankruptcy
28 Judge. Pursuant to the Bankruptcy Court’s *Amended General Order No. 38 In re: Coronavirus*
Disease Public Health Emergency, dated March 30, 2020, **the Hearing will be conducted**
telephonically or by video conference. The courtroom will be closed. All parties who wish to
appear at the Hearing should refer to the Bankruptcy Court’s website, www.canb.uscourts.gov > Rules
and Procedures > District Procedures > Policy and Procedure for Appearances by Telephone, for
current information about how to appear. Reorganized Debtors’ Counsel will, as a courtesy and on
request, provide by email to those who have filed timely Responses updated information regarding
how to attend.

1 **These Omnibus Claims Objection Procedures DO NOT APPLY to any proofs of claim**
2 **with respect to (a) FIRE VICTIM CLAIMS or (b) SUBROGATION WILDFIRE CLAIMS.**

3 **BASIS FOR OBJECTION TO YOUR PROOF(S) OF CLAIM:** By the Omnibus
4 Objection, the Reorganized Debtors seek to disallow one or more of your Proof(s) of Claim (as defined
5 therein) listed above as “Objected-To Claim(s)” on the grounds that the designated Proof(s) of Claim
6 has been satisfied or released during or prior to these Chapter 11 Cases in accordance with the
7 Bankruptcy Code, any applicable rules, or Court orders. If you do NOT oppose the disallowance of
8 your Objected-To Proof(s) of Claim listed above, then you do NOT need to file a written Response to
9 this Omnibus Objection and you do NOT need to appear at the Hearing. If you do nothing, the
10 Objected-To Claim(s) will be disallowed. To the extent your Proof(s) of Claim relates to protective,
11 unliquidated claims relating to the Reorganized Debtors’ potential post-petition non-performance
12 under an assumed agreement, you retain all remedies that would have existed had these Chapter 11
13 Cases not been filed, and the Reorganized Debtors represent that they will not raise any bankruptcy
14 defenses.

15 **FILING AND SERVICE OF RESPONSE:** If you DO oppose the disallowance of your
16 Objected-To Proof(s) of Claim listed above, then you MUST file a response (a “**Response**”), in
17 writing, with the Bankruptcy Court, and serve it on the counsel for the Reorganized Debtors at
18 PGEclaims@kbkllp.com so as to be received by no later than **4:00 p.m. (Pacific Time) on September**
19 **29, 2020 (the “Response Deadline”):** You must file the Response through the Court’s electronic case
20 filing (“ECF”) system if you have access to the ECF system; service on the Reorganized Debtors’
21 Counsel will occur automatically upon ECF filing; and no separate service of your Response is
22 required. If you do NOT have access to the ECF system, service must be made by electronic mail to
23 the email addresses of the Reorganized Debtors’ counsel as shown on the Objection, and you must
24 arrange for the Response to be filed with the Court within two business days thereafter. If you do not
25 have the ability to serve a Response electronically, the Response must be served by mail, express or
26 some other means so either (a) it is actually received by the Reorganized Debtors’ Counsel by the
27 Response Deadline, or (b) it is dispatched not later than the Response Deadline through a postal or
28 commercial express service that will make actual delivery not more than two business days after the
29 Response Deadline, and in that case the Claimant must inform the Reorganized Debtors’ counsel by
30 email, telephone or facsimile before the Response Deadline of the Claimant’s name and phone number,
31 the number of the Omnibus Objection, and the fact that a paper Response is being delivered by
32 express.

33 **CONTENTS OF RESPONSE** The Response must, at a minimum, include the following:
34 (i) a caption setting forth the name of the Bankruptcy Court, the name of the Reorganized Debtor, the
35 case number and title of the Omnibus Objection to which the Response is directed; (ii) your name, the
36 assigned number(s) of your Proof(s) of Claim, and an explanation for the amount of the Proof(s) of
37 Claim; (iii) a concise statement setting forth the reasons why the Bankruptcy Court should not sustain
38 the Omnibus Objection; (iv) a declaration under penalty of perjury of a person with personal
39 knowledge of the relevant facts that support the Response; (vi) your name, address, telephone number,
40 and/or the name, address, and telephone number of your attorney and/or designated representative to
41 whom counsel for the Reorganized Debtors should serve a reply to the Response, if any; and (vii) the
42 name, address, telephone number, and email address of the party with authority to reconcile, settle, or
43 otherwise resolve the Omnibus Objection on your behalf, if any.

1 If the Bankruptcy Court does not disallow your Objected-To Proof(s) of Claim listed above,
2 then the Reorganized Debtors have the right to object on other grounds to your Proof(s) of Claim at a
2 later date. You will receive a separate notice of any such objection.

3 **TO GET COPIES OF THE COMPLETE OBJECTION:** Copies of the complete Omnibus
4 Objection and the other pleadings and documents identified herein can be viewed and/or obtained:
5 (i) by accessing the Bankruptcy Court's website at <http://www.canb.uscourts.gov> [PACER account
6 required], (ii) for free by download from on the Reorganized Debtors' approved notice and claim
agent's website at <https://restructuring.primeclerk.com/pge/Home-DocketInfo>, or (iii) by mail, for free,
by calling Prime Clerk LLC at (844) 339-4217 (Toll Free) or by email at pgeinfo@primeclerk.com to
request a complete copy of the Omnibus Objection, including all Exhibits.

7 Dated: September 3, 2020

KELLER BENVENUTTI KIM LLP

8 /s/ Peter J. Benvenutti
9 Peter J. Benvenutti

10 *Attorneys for Debtors and Reorganized Debtors*

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28